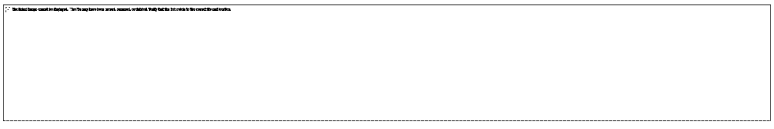
Message

From: Daniels, Rhys G. [daniels@khlaw.com]
Sent: 6/9/2021 2:20:29 PM
To: Bauer, Jeff [Bauer.Jeff@epa.gov]; Berger, Tom C. [Berger@khlaw.com]
CC: Master, Barbora [Master.Barbora@epa.gov]; Price, Amanda [price@khlaw.com]; Lee, Virginia [Lee.Virginia@epa.gov]
Subject: RE: P-16-05X3
Attachments: ATT00001.txt

Morning Jeff,

Just checking in to see if you have any update for this case.

Rhys G. Daniels, Ph.D.
Staff Scientist
tel:+1 202.434.4270 | fax: +1 202.434.4646 | daniels@khlaw.com
1001 G Street NW, Suite 500 West | Washington, DC 20001



From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Friday, May 14, 2021 4:32 PM
To: Berger, Tom C. <Berger@khlaw.com>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Lee, Virginia <Lee.Virginia@epa.gov>
Subject: RE: P-16-05X3

Rhys,

If you could try and make any request using this thread. It is hard to keep track when you send a new email each time. In response to your email earlier this week, I am still waiting on the final HH report for the Consent Order Modification with the new exposures updated in the March engineering report.

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
http://www.epa.gov/oppt/newchems/

EPA East Building, room 4133M
1201 Constitution Ave., NW
Washington, DC 20004
Phone: 202-564-9042, Fax: 202-564-9490

From: Berger, Tom C. <Berger@khlaw.com>
Sent: Monday, April 12, 2021 3:18 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

I hope that all is well.

Just checking back in on this.

Thanks again - Tom

From: Berger, Tom C.
Sent: Tuesday, March 30, 2021 1:13 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Jeff - thanks.

It remains difficult to understand why a chemical that will be used at sites that will be scattered throughout the U.S. and that is designed to chemically react extremely quickly with a chemical with which it is intimately mixed would be capable of posing a GenPop risk.

Tom

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Tuesday, March 30, 2021 12:34 PM
To: Berger, Tom C. <Berger@khlaw.com>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Tom,

The engineer did update the report and I am assessing that now. It appears they did update the work inhalation exposures and may be enough to get down to the APF of 50. However, the fugitive air release has not changed and using the loss fraction of 35% is still assumed in the report based on uncertainty and unknow conditions of the use sites. This is the release that really needed to change to address the gen pop concern.

Let me get back to you

Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)

Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
http://www.epa.gov/oppt/newchems/

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1201 Constitution Ave., NW
Washington, DC 20004
Phone: 202-564-9042, Fax: 202-564-9490

From: Berger, Tom C. <Berger@khlaw.com>
Sent: Tuesday, March 30, 2021 10:21 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

Just checking in on this.

Thanks - Tom

From: Berger, Tom C.
Sent: Monday, March 15, 2021 2:13 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

It was submitted via CDX over the weekend.

Best regards,
Tom

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Thursday, March 11, 2021 3:42 PM
To: Berger, Tom C. <Berger@khlaw.com>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Tom,

I been checking CDX for the new information, Can you check to see if it actually was received.

Thanks
Jeff.

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
http://www.epa.gov/oppt/newchems/

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Phone: 202-564-9042, Fax: 202-564-9490

From: Berger, Tom C. <Berger@khlaw.com>
Sent: Thursday, March 11, 2021 1:17 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

Just making sure you received this and are working on it.

Thanks again – Tom

From: Berger, Tom C.
Sent: Monday, March 8, 2021 9:58 AM
To: 'Bauer, Jeff' <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

Thanks for taking the time to speak with us last week.

As we discussed on our call and detail below, we and the submitter believe that: (1) this case presents no GenPop / fugitive risk; and (2) worker exposure can suitably be controlled by use of an APF-50 respirator.

GenPop / Fugitive Risk

EPA's modeling assumes a "worst-case 20 percent transfer efficiency" and, thus, "80 percent release of unreacted P-16-05X3 during SPF application." That is, EPA assumes a loss rate of 80 percent during SPF application. For the reasons set forth below, this is an **enormous** overestimate of potential releases.

Per the revised engineering report dated October 26, 2020, because foam containing P-16-05X3 would be applied on a construction job site, use of engineering controls for mist would be unlikely. Because the mixed spray foam would undergo reaction upon curing, the magnitude of release will depend on the amount of unmixed PMN substance released. Accordingly, EPA assessed fugitive losses to air during SPF application: (a) using a worst-case 20 percent transfer efficiency and (b) assuming a worst-case release of 100 percent of the PMN substance (*i.e.*, no cure reaction involving the PMN substance).

In other words, EPA assumed 80 percent release of unreacted P-16-05X3 during SPF application. Based on the submitter-specified manufacture of 23 batches/year at 19,613 kg/batch, which equates to manufacture of 451,099 kg/year neat P-16-05X3, application of the 80-percent loss rate yields a fugitive release to air of 362,500 kg/year of the PMN substance.

Upon mixing with diisocyanate components in the mixing chamber of a high-pressure internal spray gun, reactive polyol substances such as P-16-05X3 instantaneously commence chemical reaction to form polyurethane polymers. The mixture of polyol and diisocyanate components would continue to react as they leave the spray gun and coat the targeted structure during "fast set" SPF application. The result would essentially be quantitative chemical incorporation, within only 4-6 seconds, of the individual polyol molecules into a largely cured polyurethane matrix. Thus, during SPF application there simply can and will be no significant fugitive release of unreacted PMN substance.

This fully comports with the information provided in our CDX submission of July 20, 2020, in which we noted that the cure time for formulations containing P-16-05X3 during SPF applications is very short, with the PMN substance undergoing reaction immediately as it mixes in and leaves the spray foam gun, becoming largely cured (*i.e.,* fully reacted) in 4-6 seconds:

> ***Typical Cure Time***
>
> As discussed in section AS of the training manual "SPF Assistant Study Guide," issued January 21, 2014, by the Spray Polyurethane Foam Alliance (SPFA) for use in SPF Assistant certification, the cure time for spray polyurethane foam is very quick and is defined by the following three stages:
>
> 1. Cream Time: This stage gets its name from the brown liquid turning a creamy color. It designates when the reaction begins.
> 2. Gel Time: This stage is the point in the reaction where polymer formation begins. If sampled at this time, a string of material would pull away from the foam.
> 3. Rise time: This is the stage at which the foam stops growing. This metric is not in the SPF training guide, but is commonly used in the industry.
>
> For testing purposes, the submitter used a typical formulation in which the PMN substance was the sole polyol component and comprised 33 weight percent of the sprayed material composition. Using standard high-pressure spray equipment (Gusmer H-20/35 Spray Foam Machine with Fusion AP (air-purge) gun), the submitter measured the following cure profile:
>
> - Material: PMN-16-05X3
> - Cream: 1 second
> - Gel: 4 seconds
> - Rise: 6 seconds

The measured times above align well with the SPFA training document, which suggests cream should be immediate and gel should be 4-8 seconds.

Spray insulation generally is an expensive product, and the applicator is financially motivated to not waste product. The applicator adjusts equipment to minimize losses, including keeping a tight spray pattern, keeping the flight path short to the spray target, and prudent use of the materials to minimize waste.
Also, any GenPop exposure would translate to clean up costs for the spray applicator. Urethane has excellent adhesion properties, and, thus, cleanup costs would be **extraordinarily** high if fugitive releases were allowed to occur as estimated by EPA.

In summary, the PMN substance would undergo chemical reaction immediately as it leaves the spray foam gun and would largely be cured in 4-6 seconds, making the large fugitive release amounts predicted by EPA physically and chemically impossible.

Worker Inhalation Exposure

In accord with the information in the "Worker Inhalation Spreadsheet" provided in April 2020, using the default PNOR mass concentration (C_{total}) of 5 mg/m^3 respirable particles containing the NCS, the submitter-specified mass fraction (F_{NCS}) of 0.35 for P-16-05X3 in SPF applications, the EPA-selected HEC of 0.22 mg/m^3 (as opposed to the POD of 0.60 mg/m^3), and EPA's standard benchmark MOE of 30 for analog substances, the Agency initially calculated a Fold Factor of 238 for P-16-05X3:

1. PDR = (C_{total})(F_{NCS})(IR)(ED) = (5 mg/m^3)(0.35)(1.25 mg/m^3)(8 hr/day-shift) = (1.75 mg/m^3)(1.25 mg/m^3)(8 hr/day-shift) = 17.5 mg/day-shift = 1.75 mg/m^3
2. MOE_{NCS} = POD / PDR = (0.22 mg/m^3) / (1.75 mg/m^3) = 0.13
3. Fold Factor = $MOE_{benchmark}$ / MOE_{NCS} = 30 / 0.13 = 238

In accord with the information provided in the revised engineering report of October 26, 2020, using the default PNOR mass concentration (C_{total}) of 15 mg/m^3 total airborne particles containing the NCS (as opposed to the initially used default PNOR mass concentration (C_{total}) of 5 mg/m^3), an inhalation mass fraction (F_{inh}) of 0.0322 (based on 3.22 weight percent inhalable particles in neat P-16-05X3), the EPA-selected HEC of 0.22 mg/m^3, and the standard benchmark MOE of 30, we understand that the Agency calculated its current Fold Factor of 65 for P-16-05X3:

1. PDR = (C_{total})(F_{inh})(IR)(ED) = (15 mg/m^3)(0.0322)(1.25 mg/m^3)(8 hr/day-shift) = (0.483 mg/m^3)(1.25 mg/m^3)(8 hr/day-shift) = 4.83 mg/day-shift = 0.483 mg/m^3
2. MOE_{NCS} = POD / PDR = (0.22 mg/m^3) / (0.483 mg/m^3) = 0.46
3. Fold Factor = $MOE_{benchmark}$ / MOE_{NCS} = 30 / 0.46 = 65

Recognizing that the inhalation mass fraction (F_{inh}) represents the 3.22 weight percent of particles below 100 microns (*i.e.,* inhalable particles) in the neat PMN substance, and that the PMN specified use of up to 35 weight percent P-16-05X3 as a component in SPF applications, we believe that EPA's current calculations ignore the submitter-specified mass fraction (F_{NCS}) of 0.35 for P-16-05X3 in SPF applications. If one restores the missing mass fraction (F_{NCS}) of 0.35 for P-16-05X3 in SPF applications, one obtains a Fold Factor of only 23:

1. PDR = (C_{total})(F_{NCS})(F_{inh})(IR)(ED) = (15 mg/m^3)(0.35)(0.0322)(1.25 mg/m^3)(8 hr/day-shift) = (0.169 mg/m^3)(1.25 mg/m^3)(8 hr/day-shift) = 1.69 mg/day-shift = 0.169 mg/m^3
2. MOE_{NCS} = POD / PDR = (0.22 mg/m^3) / (0.169 mg/m^3) = 1.30
3. Fold Factor = $MOE_{benchmark}$ / MOE_{NCS} = 30 / 1.30 = 23

For this reason, the submitter believes that worker exposure can suitably be controlled by use of an APF-50 respirator.

* * *

We trust that you find this information useful and that it facilitates an expedient and satisfactory resolution to this case. If you have any questions, please let us know immediately.

Thanks again and best regards,
Tom

Thomas C. Berger
Partner
tel: 202.434.4285 | fax: 202.434.4646 | berger@khlaw.com
1001 G Street, N.W., Suite 500 West | Washington, D.C. 20001

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From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Wednesday, February 24, 2021 5:32 PM
To: Berger, Tom C. <Berger@khlaw.com>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Tom,

I sent Sam the engineering and exposure reports January 27, 2021. The fugitive air release looks like it will present a gen pop risk. The work inhalation APF will be 1,000. If you have had the chance to look those exposure over and want to talk about them we can address them as I am still waiting on the final Human Health report.

I will send another email to RAB as to the status of getting the final report and will set up meeting with you on Wednesday next week.

Thanks
Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
http://www.epa.gov/oppt/newchems/

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Washington, DC 20004
Phone: 202-564-9042, Fax: 202-564-9490

From: Berger, Tom C. <Berger@khlaw.com>
Sent: Wednesday, February 24, 2021 3:12 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Price, Amanda <price@khlaw.com>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

The commercial needs here are getting urgent. What is your availability for a conference call on this in the next 5-6 working days?

Thanks – Tom

From: Berger, Tom C.
Sent: Wednesday, February 24, 2021 11:27 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Price, Amanda <price@khlaw.com>
Subject: RE: P-16-05X3

Hi Jeff –

We have a call on this with the submitter today at 2:00 – any update?

Thanks – Tom

From: Berger, Tom C.
Sent: Friday, February 19, 2021 11:12 AM
To: 'Bauer, Jeff' <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Price, Amanda <price@khlaw.com>
Subject: RE: P-16-05X3

Hi Jeff –

Just checking in on this - thanks

From: Berger, Tom C.
Sent: Wednesday, January 13, 2021 5:25 PM
To: 'Bauer, Jeff' <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Price, Amanda <price@khlaw.com>
Subject: RE: P-16-05X3

Hi Jeff –

The submitter asked me to reach out to you regarding timing. Recall that we need to both amend the SNUR (recall that the number of use sites make a SNUN approach unworkable) and the section 5(e) order, neither of which have statutory or regulatory timeframes or deadlines. Can you estimate a timeframe in terms of what you and RAD need to accomplish as well as how long it might be expected to take thereafter to amend the SNUR and the 5(e) order?

Thanks again and best regards,
Tom

Thomas C. Berger
Partner
tel: 202.434.4285 | fax: 202.434.4646 | berger@khlaw.com
1001 G Street, N.W., Suite 500 West | Washington, D.C. 20001

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From: Berger, Tom C.
Sent: Friday, January 8, 2021 1:54 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Daniels, Rhys G. <daniels@khlaw.com>; Price, Amanda <price@khlaw.com>
Subject: FW: P-16-05X3

Hi Jeff –

I hope you had a great holiday!

Just checking in on this.

Thanks again - Tom

From: Master, Barbora <Master.Barbora@epa.gov>
Sent: Thursday, December 31, 2020 11:24 AM
To: Berger, Tom C. <Berger@khlaw.com>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: P-16-05X3

Hi Tom –

I don't have anything new to share with you. Jeff will be back next week (on Tuesday).

Thanks, Barbora

Barbora Master
Team Leader, Risk Management Branch 1
New Chemicals Division
U.S. Environmental Protection Agency
202-343-9899

From: Berger, Tom C. <Berger@khlaw.com>
Sent: Tuesday, December 29, 2020 5:58 PM
To: Master, Barbora <Master.Barbora@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: P-16-05X3

Hi Barbora –

As some time has passed I thought I would check in on this.

Thanks much - Tom

From: Master, Barbora <Master.Barbora@epa.gov>
Sent: Thursday, December 10, 2020 4:43 PM
To: Berger, Tom C. <Berger@khlaw.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>
Subject: RE: P-16-05X3

Tom –

I just checked in with the risk assessors, but I don't have anything new to tell you. Your case is still one that we're working through. Unfortunately, I can't commit to a specific end date, but I will do what I can on my end. As you can imagine, a number of people are out of the office during the holiday season, so it's a tough time.

Best, Barbora

Barbora Master
Team Leader, Risk Management Branch 1
New Chemicals Division
U.S. Environmental Protection Agency
202-343-9899

From: Berger, Tom C. <Berger@khlaw.com>
Sent: Thursday, December 10, 2020 12:16 PM
To: Master, Barbora <Master.Barbora@epa.gov>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>
Subject: RE: P-16-05X3

Barbora – thanks for the update.

My client was wondering whether this important issue could be resolved this year. Please advise and take any steps you can to expedite.

Thanks again - Tom

From: Master, Barbora <Master.Barbora@epa.gov>
Sent: Tuesday, December 8, 2020 1:57 PM
To: Berger, Tom C. <Berger@khlaw.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>
Subject: RE: P-16-05X3

Good Afternoon Tom –

Jeff will be out for the rest of the month. I am monitoring his cases while he is out. I have nothing new to report on your case, unfortunately. I will let you know if I get any update.

-Barbora

Barbora Master
Team Leader, Risk Management Branch 1
New Chemicals Division
U.S. Environmental Protection Agency
202-343-9899

From: Berger, Tom C. <Berger@khlaw.com>
Sent: Tuesday, December 08, 2020 9:57 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora

<Master.Barbora@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

With the holidays rapidly approaching I am checking in again.

Thanks – Tom

From: Berger, Tom C.
Sent: Wednesday, December 2, 2020 8:56 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

Just checking in.

Thanks and best regards,
Tom

From: Berger, Tom C.
Sent: Monday, November 23, 2020 3:25 PM
To: 'Bauer, Jeff' <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; 'Master, Barbora' <Master.Barbora@epa.gov>
Subject: RE: P-16-05X3

Hi Jeff –

I hope that all is well.

I know it's a short week but just following up with you. Last we communicated with you, you were expecting the QA/QC'd Health Report, as well as a sanitized Exposure Report.

Thanks and best regards,
Tom

Thomas C. Berger
Partner
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From: Berger, Tom C.
Sent: Wednesday, October 28, 2020 10:03 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>
Subject: RE: P-16-05X3

Jeff – thanks much – please do keep us posted. We look forward to receiving the updated report.

Best regards,
Tom

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Tuesday, October 27, 2020 3:07 PM
To: Berger, Tom C. <Berger@khlaw.com>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>
Subject: RE: P-16-05X3

Tom,

I want to wait till we get the HH report then I can share that with you and we can work out the Risk Management of the PMN. I am taking your comments on the proposed scenarios into account. Getting the HH report may get to the outcome you presented in September.

Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
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New Chemicals Program (7405M)
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From: Berger, Tom C. <Berger@khlaw.com>
Sent: Tuesday, October 27, 2020 2:51 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Price, Amanda <price@khlaw.com>; Daniels, Rhys G. <daniels@khlaw.com>; Master, Barbora <Master.Barbora@epa.gov>
Subject: RE: P-16-05X3

Jeff – thanks so much. Can you tell us where things are headed from a regulatory standpoint?

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Tuesday, October 27, 2020 2:36